

Fire Protection District 5 Mason County

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March 19, 1993

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Secretary,
Federal Communications Commission
Washington, DC 20554

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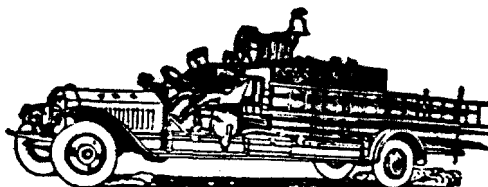
As a Fire and Medical Emergency Dispatch Center in a rural County of Washington State, and a user of radio frequencies in the Public Safety spectrum, we are very concerned about the proposed FCC docket 92-235.

We appreciate the fact that the FCC recognizes and is taking steps to alleviate the problems associated with the lack of mobile radio spectrum. However, we have serious concerns with portions of the docket that appear to create more problems for public safety organizations than they solve.

Only national defense is ranked higher in priority than public safety communications as established both by statute and court decision. We feel that many sections of this docket have the effect of reducing this priority and in many cases public safety communications appear to have become secondary to other users.

Our number one concern is the short term and fast track to comply with the proposed docket. Vendors are not manufacturing equipment that meets the bandwidth requirement of section 88.413 coupled with the fact that needed accessory equipment such as cavities, isolators, combiners, etc., are not manufactured and appear to be beyond the present manufacturing capabilities of vendors. Even if the equipment could be manufactured there isn't enough time allowed for systems to be purchased, installed, and tested to determine if the new equipment and technology will meet the operational needs of public safety users.

The requirement of turning the transmitter modulation down January 1, 1996 will in effect create operational hardships to existing systems. Some manufacturing designs do not permit the reduction of the transmitter modulation to the level specified in section 88.413. Many of the current radio receivers do not have circuits that allow receiver bandwidths to be easily reduced. In fact most receivers have integrated designs that have been "optimized" for selectivity, sensitivity, desensitization, and intermod rejection. Arbitrarily reducing the modulation the receiver hears will impact the total operating characteristics of the receiver, consequently, it may be impossible for these receivers to operate satisfactorily with reduced modulation. In Mason County, we would envision not being able to clearly understand transmissions from units 10 to 20 miles from our base stations and may find ourselves in the position of not being able to deliver life-saving information, directions, and other vital information to the field units.



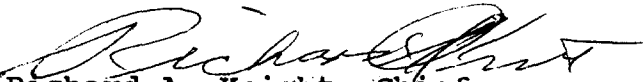
Station 88 420' remains that transmitter never levels be reduced

7. Protect the public safety band from 3rd party and entrepreneur licensees.

8. Insure the quality of public safety communications will not be sacrificed for the sake of spectrum efficiency.

In conclusion we feel that docket 92-235 should recognize and make provisions for the unique needs of the public safety service. The need for high quality and reliable communications needed to respond to the public in a rapid and efficient manner should not be compromised. Issues raised by this letter and various papers sent to you by APCO on behalf of the public safety organizations in the United States must be addressed.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Richard A. Knight", with a stylized flourish at the end.

Richard A. Knight, Chief
Fire Protection District 5, Mason County